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**VIA ECF**

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 1/15/2020

Hon. Vernon S. Broderick  
United States District Judge  
United States District Court for the Southern District of New York  
40 Foley Square, Courtroom 518  
New York, NY 10007

Re: **Mendez v. J.C. Penney Corporation, Inc., Civil Action No.: 1:19-cv-09887-VSB**

Dear Judge Broderick:

This firm represents Defendant J.C. Penney Corporation, Inc. ("Defendant") in the above-referenced action. We write, with Plaintiff's consent, to respectfully request an extension of the deadline to respond to the Complaint, up to and including March 9, 2020.

By way of background, the original deadline for Defendant to respond to the Complaint was January 7, 2020. On December 13, 2020, the Court granted Defendant's first letter motion for an extension of this deadline. (ECF No. 8.) Pursuant to the Court's Order, Defendant's current deadline to respond to the Complaint is February 6, 2020. (*Id.*)

Defendant respectfully requests that this deadline be extended by an additional thirty (30) days, up to and including March 9, 2020. This is the second request for an extension of this deadline which, if granted, will not affect any other scheduled dates. It is not intended to cause undue delay, but instead to provide additional time for Defendant to investigate the allegations in the Complaint and provide a response. The undersigned has communicated with counsel for Plaintiff, and Plaintiff consents to this request.

We thank the Court for its time and attention to this matter, and for its consideration of this application.



Respectfully submitted,

SEYFARTH SHAW LLP

*/s/ John W. Egan*

John W. Egan

cc: All counsel of record (via ECF)